

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jiangsu Huari Webbing
Leather Co., Ltd.

Plaintiff

v.

Joes Identified in
Schedule "A"

Defendants.

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Case No. 23-cv-2605

DECLARATION OF BIN LIU

I, Bin Liu, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the manager of the Plaintiff, Jiangsu Huari Webbing Leather Co. Ltd ("Huairi") in this action for over five years. As such, I have personal knowledge about the issues relevant to this action and motion.
2. Based on the information provided by the defendant D059, we confirm that this company is a Canadian company and has been communicating with us under the D.B.A as Monkey Line.
3. On June 14, 2019, Monkey Line made its first purchase from our company through Alibaba International Station, buying 500 sets of products for sale on its Amazon store.

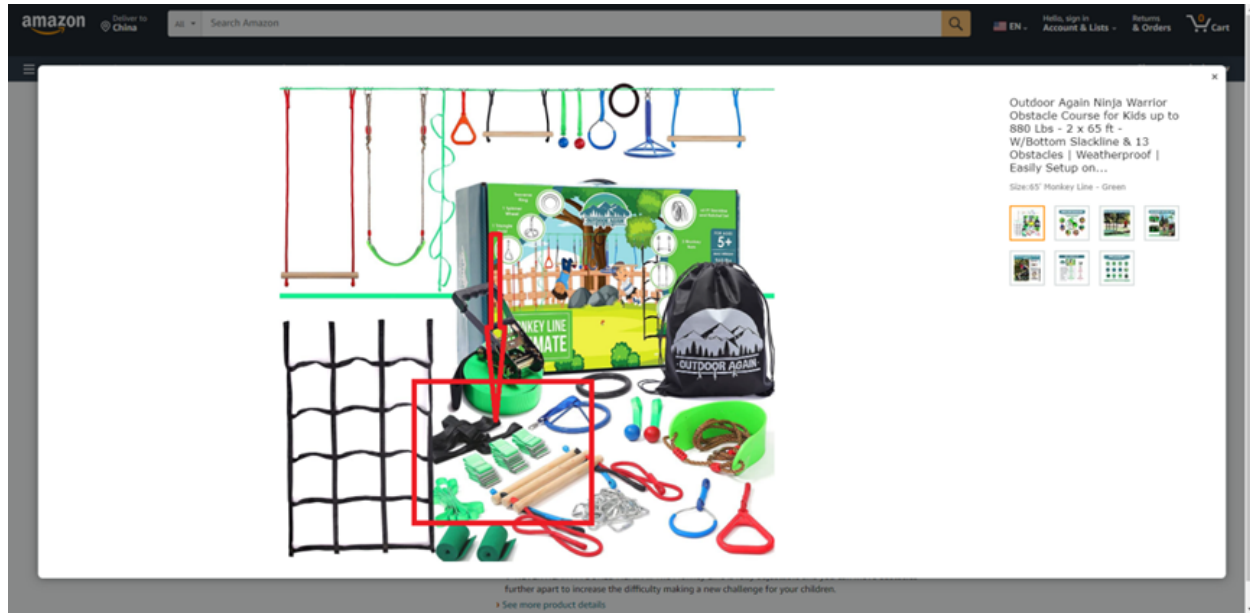


4. On April 20, 2021, Monkey Line made its final purchase from our company through Alibaba International Station, buying 3000 sets of products for sale on its Amazon store.



5. Between June 14, 2019 and April 20, 2021, there were also several purchasing orders placed by Monkey Line.
6. After the last order was placed on April 20, 2021, Monkey Line did not purchase any products from our company through offline or other procurement platforms.
7. After investigation, we found that the reason for Monkey Line's termination of cooperation with us after April 20, 2021 was due to competition from other unauthorized suppliers who offered lower prices. However, in the course of multiple negotiations with the defendant, Monkey Line, we repeatedly informed them that we are the holder of the patent, and the patent application in the US was under the period of public notice and examination. Despite our warnings, the defendant ignored us and continued to purchase products from other infringing suppliers for sale on Amazon.
8. On June 20, 2022, we were notified that our product will soon be protected by the US Patent Office. We contacted Monkey Line again and hoped that they could cooperate with us again and be informed of the potential risks. However, despite being aware of the infringement, Monkey Line continued to purchase products from other infringing suppliers.

9. In November 2022, Monkey Line learned that they had obtained the patent and made some modifications to all the fasteners before putting them back on sale. However, the buckles are still rectangular, consistent with the description in our patent certificate.
10. Monkey Line has multiple links in their Amazon store, and the images in their store descriptions still show infringing products:



(https://www.amazon.com/Outdoor-Again-Warrior-Obstacle-Course/dp/B0BZ6MC4VD/ref=sr_1_5?m=A27ET2640OUQ5C&marketplaceID=ATVPDKIKX0DER&qid=1681539724&s=merchant-items&sr=1-5&th=1)

11. We decided to initiate a separate litigation against this defendant for patent infringement, unfair competition and other relevant bases, which needs more time. And therefore, decided to dismiss this defendant without prejudice at this stage.

I declare under penalty and perjury of the United States of America, that the foregoing statements and facts are true and correct.

Executed on April 17, 2023

Bin Liu.

Bin Liu

amazon

Deliver to J.Zhang
Flushing 11354

All

Search Amazon

Q

EN

Hello, J.Zhang
Account & Lists

Returns
& Orders

0

AllClinicSame-Day DeliveryAmazon BasicsCustomer ServiceBest SellersPet SuppliesBeauty & Personal CareAmazon Home

Toys & Games › Sports & Outdoor Play › Play Sets & Playground Equipment › Playground Fitness Equipment



Roll over image to zoom in

Outdoor Again Ninja Warrior Obstacle Course for Kids up to 880 Lbs - 2 x 65 ft - W/Bottom Slackline & 13 Obstacles | Weatherproof | Easily Setup on Trees or Posts | Ninja Course for Kids Outside

Visit the Outdoor Again Store

\$159⁹⁸

FREE Returns

Save more ☐ Apply \$35 coupon Shop items > | Terms

Get a \$100 Amazon.com Gift Card upon approval for the Amazon Business American Express Card. Terms apply.

Size: 65' Monkey Line - Green		
65' Monkey Line - Green	55' Monkey Line	65' Monkey Line
\$159.98	\$144.49	\$159.49

Purchase options and add-ons

Payment plans
\$15.60/mo (12 mo) at example APR of 30% (rates from 10-30% APR)

Size	65' Monkey Line - Green
Material	Stainless Steel
Brand	Outdoor Again

About this item

- ✓ UNLESS YOUR INNER NINJA ... Get the new and improved 2.0 Monkey Line kit, which includes all weatherproof material/treatment, safer bucklers, obstacles designed for kids, and a new selection of obstacles! The ULTIMATE ninja obstacle course for kids outside
- ✓ THE ONLY NINJA COURSE WITH NO SAG ... The Monkey Line has multiple features which reduce 90% of sagging. Such as, a thicker slackline and greater tension ratchet!
- ✓ 12 ESSENTIAL OBSTACLES FOR ANY NINJA WARRIOR ... Open your door to the world of

☐ Add your 30-day FREE trial of Prime and get fast, free delivery

\$159⁹⁸

FREE Returns

FREE delivery Sunday, April 23

Or fastest delivery Saturday, April 22. Order within 10 hrs 38 mins

Deliver to J.Zhang - Flushing 11354

In Stock

Qty: 1

Add to Cart

Buy Now

Payment Secure transaction

Ships from Amazon

Sold by Hyponix Brands.

Return policy: Eligible for Return, Refund or Replacement within 30 days of receipt

☐ Add a gift receipt for easy returns

Add to List


Add to Registry & Gifting

Have one to sell?
Sell on Amazon

outdoor play with The Gorilla Line. This easy-to-use, all-inclusive backyard toy is the ultimate jungle gym for kids

- ✓ YOUR KIDS WILL ENJOY PLAYING OUTDOORS ... Buy it now so you can have your kids staying fit and healthy with the Monkey Line. They'll be outside swinging, jumping, and climbing on the Monkey Line!
- ✓ NEVER HEAR I'M BORED AGAIN ... The Monkey Line is fully adjustable and you can move obstacles further apart to increase the difficulty making a new challenge for your children.

[See more product details](#)

 [Report incorrect product information.](#)

Buy it with



Total price: **\$243.96**

Add all three to Cart

 These items are shipped from and sold by different sellers. [Show details](#)

- ✓ **This item:** Outdoor Again Ninja Warrior Obstacle Course for Kids up to 880 Lbs - 2 x 65 ft - W/Bottom Slackline & 1... **\$159.98**
- ✓ Fofana Ninja Slider Slackline Pulley - Turn Slacklines Into Ziplines with The Most Fun New Accessory for Your Ninja ... **\$37.99**
- ✓ TOPNEW 12 Ninja Tree Climbing Holds for Kids Climber, Adult Climbing Rocks with 6 Ratchet Straps for Outdoor Ni... **\$45.99**

Product Description

Product description content area.

Product information

Technical Details

Manufacturer	Outdoor Again
Brand	Outdoor Again
Model	OA-MonkeyLine-Ultimate-2.1-NS-v2
Item Weight	23.7 pounds
Product Dimensions	17.5 x 13.48 x 7.8 inches
Country of Origin	China
Item model number	OA-MonkeyLine-Ultimate-2.1-NS-v2
Manufacturer Part Number	OA-MonkeyLine-Ultimate-2.1-NS-v2

Additional Information

ASIN	B0BZ6MC4VD
Best Sellers Rank	#27,401 in Toys & Games (See Top 100 in Toys & Games) #17 in Playground Fitness Equipment #94 in Toddler Outdoor Play #282 in Play Tents & Preschool Outdoor Toys
Date First Available	March 21, 2023

Warranty & Support

Amazon.com Return Policy: **Amazon.com.tr Voluntary 30-Day Return Guarantee:** You can return many items you have purchased within 30 days following delivery of the item to you. Our Voluntary 30-Day Return Guarantee does not affect your legal right of withdrawal in any way. You can find out more about the exceptions and conditions [here](#).

!

This page will undergo scheduled maintenance from 04/19/23 06:00 UTC to 04/19/23 08:00 UTC, and Seller feedback may be unavailable during these periods. Thank you.

Hyponix Brands.

Visit the Hyponix Brands. storefront

★★★★☆ | 94% positive in the last 12 months (36 ratings)

About Seller

Hyponix Brands. is committed to providing each customer with the highest standard of customer service.

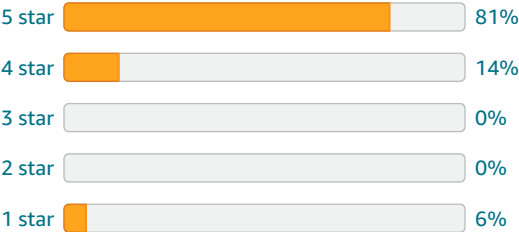
Have a question for Hyponix Brands.?

Ask a question

Feedback

★★★★☆ 4.6 out of 5
36 ratings

12 months



Learn more about how seller feedback works on Amazon

Share your thoughts with other customers

Leave seller feedback

FILTER BY

All stars

36 total feedbacks in 12 months

- ★★★★☆

"Product arrived earlier than expected "

By Haldor Harms on April 16, 2023.
- ★★★★★

"Tube work rorschach me "

By richard mitchem on April 8, 2023.
- ★★★★☆

"It does work for 50 ft area, can't reach "

By Honest review on April 7, 2023.
- ★★★★★

"Hopefully we can try soon to cold still. Great shipping time "

By melissa on April 2, 2023.
- ★★★★★

"Item delivered as requested. Had to read the instructions carefully and repeatedly, but product worked well once I followed them exactly. "

By F. Lawler on March 31, 2023.

Previous Next

Return & Refund Policies

Please refer to the Amazon.com Return Policy .

Detailed Seller Information

Business Name: Hyponix Brands Ltd.

Business Address:

3 Germay Dr,

Unit 4 #2456

Wilmington

DE 19804






US

You might be looking for






Shippin

Other P

Help

				
TT TRSMIMA 98 ft /120 ft /150 ft Zip Line Kit for Kids and Adult Up to 380 lb - Updated Removab... ★★★★★ 1,109	Safe Tree Swing Hanging Kit (Set of 2) - 10ft Long Straps with Two Alloy Carabiners and 2000 Lb Breaking Strength - Ea... ★★★★★ 2,115	Gusto Games Zipline Kit for Backyard for Kids and Adults - 110ft Cable with Harness for Extra Safety ★★★★★ 178	Jungle Gym Kingdom Swing Sets for Backyard, Monkey Bars & Swingset Accessories - Set... ★★★★★ 7,846 #1 Best Seller in Play Set Ring & Trapeze Attachments	TURFEE 2 Pack (Swing Seats Hea with 66" Chain, ! Set Accessories Replacement wi ★★★★★ 807
See all pro 42% off Deal \$98.99 Was: \$169.99 Get it as soon as Sunday, Apr 23 FREE Shipping on orders over \$25 shipped by Amazon	the seller. \$23.97 (\$11.99/Count) Get it as soon as Sunday, Apr 23 Leave seller feedback FREE Shipping on orders over \$25 shipped by Amazon	Get it as soon as Sunday, Apr 23 Tell us what you think about this page FREE Shipping on orders over \$25 shipped by Amazon	\$29.99 Get it as soon as Sunday, Apr 23 FREE Shipping on orders over \$25 shipped by Amazon	\$37.99 Get it as soon as St 23 FREE Shipping on c \$25 shipped by Arr

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